



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MLM:BWB/ZA

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 21, 2011

Via Email and ECF

Michael Hueston, Esq.
350 Fifth Avenue, Suite 4810
New York, NY 10118

Re: United States v. Kareem Ibrahim
Criminal Docket No. 07-543 (DLI)

Dear Counsel:

The government writes this letter to alert you to a prior motion and ruling in the case, and to provide additional discovery.

I. Prior Ruling on Motion in Limine

Enclosed please find a copy of a motion to preclude cross-examination of a government witness, filed under seal with the Court on July 2, 2010 in connection with the prior trial after the severance of defendant Ibrahim. As indicated in the enclosed sections of the transcript from the prior trial, the Court granted that motion to preclude. If you intend to take issue with that ruling, please let us know so that we can address the motion and ruling at the next status conference.

II. Supplemental Discovery

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and subject to the provisions set forth in the Stipulation and Order signed by the parties and ordered by the Court on July 2, 2008, the government herein furnishes supplemental discovery. In addition, the government reiterates its request for reciprocal discovery, as set forth in full in the government's initial discovery letter.

As originally disclosed on May 29, 2009, law enforcement officers in Trinidad & Tobago seized three telephones from the home of defendant Ibrahim. Enclosed please find a disc containing the contents of two of those telephones. The third telephone,

which remains available for your inspection, is inaccessible to the government.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By: /s/
Marshall L. Miller
Berit W. Berger
Zainab Ahmad
Assistant U.S. Attorneys
(718) 254-6421/6134/6522

Encl.

cc: Clerk of the Court (DLI)(via ECF) (w/o encl.)